

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER MANHATTAN  
DISASTER SITE LITIGATION

-----X

SANDRA BAGUERO,

Plaintiff(s), Index No.: 07CV05275

-against-

**NOTICE OF ADOPTION**

BATTERY PARK CITY AUTHORITY, BFP ONE  
LIBERTY PLAZA CO., LLC., BLACKMONMOORING-  
STEAMATIC CATASTOPHE, INC.  
D/B/A BMS CAT, BROOKFIELD FINANCIAL  
PROPERTIES, INC., EMPIRE STATE  
PROPERTIES, INC., GENERAL RE SERVICES  
CORP., HILLMAN ENVIRONMENTAL GROUP,  
LLC., HUDSON TOWERS HOUSING CO., INC.,  
LEFRAK ORGANIZATION, INC., LIBERTY  
HOUSE CONDOMINIUM, LIBERTY TERRACE  
CONDOMINIUM, MILFORD MANAGEMENT  
CORP., NATIONAL ASSOCIATION OF  
SECURITIES DEALERS, INC., NEW LIBERTY  
PLAZA LP, NEW YORK CITY ECONOMIC  
DEVELOPMENT CORPORATION, NEW YORK  
CITY INDUSTRIAL DEVELOPMENT AGENCY,  
NEW YORK CITY INDUSTRIAL  
DEVELOPMENT CORPORATION, ONE  
LIBERTY PLAZA, RICHARD WINNER, THE  
BOARD OF MANAGERS OF THE ONE  
LIBERTY PLAZA CONDOMINIUM (CONDO  
#1178), THE ONE LIBERTY PLAZA  
CONDOMINIUM (CONDO #1178), VERIZON  
COMMUNICATIONS, INC., VERIZON NEW  
YORK, INC, WFP ONE LIBERTY PLAZA CO.,  
L.P., WFP ONE LIBERTY PLAZA, CO. GP,  
CORP., AND WORLD FINANCIAL  
PROPERTIES, L.P., ET AL,

**1:21-MC-00102-AKH**

Defendant(s).

-----X

C O U N S E L O R S :

PLEASE TAKE NOTICE that Defendant, HILLMANN ENVIRONMENTAL GROUP,  
LLC, (hereinafter HILLMANN) as and for it's response to the allegations set forth in the

Complaint by adoption or Check-Off Complaint related to the Master Complaint filed herein and applicable to the above captioned matter hereby adopts all of the responses and all of the affirmative defenses contained in the Answer to the Master Complaint dated, filed and served August 2, 2007, *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein. Defendant, HILLMANN, also adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross claim against any and all co-defendants.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, also adopts all affirmative defenses and the jury demand herein.

WHEREFORE, Defendant, HILLMANN, demands judgment dismissing the above captioned action against it along with the costs and disbursements of this action.

Dated: White Plains, New York  
September 11, 2007

Yours, etc.,

**SAM ROSMARIN, PLLC**



By: \_\_\_\_\_  
Salvatore J. Calabrese, Esq. (5133)  
Attorneys for Defendant  
HILLMANN ENVIRONMENTAL GROUP LLC  
11 Martine Avenue – 9<sup>th</sup> Floor  
White Plains, New York 10606

(914) 686-4000

TO:

Paul Napoli, Esq.  
WORBY GRONER EDELMAN  
NAPOLI & BERN, LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006  
(877) 982-4376  
[clopalo@napolibern.com](mailto:clopalo@napolibern.com)

Robert A. Gochow, Esq.  
ROBERT A. GROCHOW, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
(212) 608-4400  
[rgrochow@aol.com](mailto:rgrochow@aol.com)

Gregory J. Cannata, Esq.  
LAW OFFICES OF GREGORY J. CANNATA  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
Liaison Counsel for Plaintiffs  
(212) 553-9206  
[cannata@cannatalaw.com](mailto:cannata@cannatalaw.com)

**SERVICE RIDER**

**1:21-mc-102 Notice has been electronically mailed to:**

Donna-Marie Baloy    Baloyd@wemed.com

Brian Andrew Bender    bbender@harrisbeach.com, jsavitsky@harrisbeach.com

Dror Bikel    dbikel@sralawfirm.com

Judith Rita Cohen    cohenj@dicksteinshapiro.com

James J. Coster    jcoster@ssbb.com, asnow@ssbb.com, bmeans@ssbb.com, jrubins@ssbb.com, managingclerk@ssbb.com, tbrock@ssbb.com

Defendants    bbrender@harrisbeach.com

Andrew Riggs Dunlap    adunlap@kirkland.com, kenymanagingclerk@kirkland.com

Thomas A. Egan    tegan@fzw.com, service@fzw.com

Virginia Goodman Futterman    vfutterman@londonfischer.com

Christian Holt Gannon    cgannon@smsm.com

Roman E Gitnik    rgitnik@lifflander.com

Stanley Goos    Jsavitsky@harrisbeach.com, sgoos@harrisbeach.com

Robert Allen Grochow    rgrochow@aol.com

Benjamin E- Haglund    bhaglund@daypitney.com

John J. Henry    jhenry@woh.com, clalyer@woh.com, jkroll@woh.com, lrice@woh.com, wnolan@woh.com

Hillman Environmental Group, LLC.    sam@rosarinlaw.com

Michael D. Hynes    michael.hynes@dlapiper.com

Barry Mark Kazan    bkazan@ebglaw.com

Frank Joseph Keenan    keenan@methwerb.com

LeFrak Organization Inc.    bbender@harrisbeach.com

Richard Eric Leff    Rleff@mcgivneyandkluger.com

Lefrak Organization, Inc. bbender@harrisbeach.com

Eric Foster Leon eleon@kirkland.com, kenymanagingclerk@kirkland.com

Christopher Allen McLaughlin christopherm@zegam.com

Anthony Molloy , III amolloy@pattonboggs.com

Kevin Jude O'Neill KJO@GOGICK.COM

Michael David Reisman mreisman@kirkland.com, kenymanagingclerk@kirkland.com

Gail L. Ritzert gail.ritzert@hrrvlaw.com, martha.raskin@hrrvlaw.com

Sam Rosmarin sam@rosmarinlaw.com

Andrew John Scholz ascholz@fzw.com, enolan@fzwz.com, service@fzwz.com

Louis Smith smithlo@gtlaw.com, gtcourtalert@gtlaw.com, petersr@gtlaw.com

Lee Ann Stevenson lstevenson@kirkland.com, kenymanagingclerk@kirkland.com

Howard F. Strongin hstrongin@sralawfirm.com

Jill Suzanne Taylor jtaylor@sralawfirm.com

James Edward Tyrrell , JR jtyrrell@pattonboggs.com, jhopkins@pattonboggs.com, tsaybe@pattonboggs.com

Mark Joseph Weber mweber@moundcotton.com

Todd E. Weisman toddw@efwlaw.com

Robin Michel Wertheimer robinwertheimer@hotmail.com

**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK: COUNTY OF WESTCHESTER:

Cristina A. Villani, being duly sworn, says, I am not a party to the action, am over 18 years of age and reside at White Plains, New York.

On September 11th, 2007 I filed with the USDC pursuant to ECF filing instructions under Case No.: 1:21-mc-00102-AKH and emailed a true copy of the annexed DEFENDANT HILLMAN ENVIRONMENTAL GROUP LLC NOTICE OF ADOPTION by electronic mailing the same to the following parties at their last known electronic mailing address:

Paul Napoli, Esq.  
WORBY GRONER EDELMAN  
NAPOLI & BERN, LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006  
(877) 982-4376  
[ShelleneBousher@NapoliBern.com](mailto:ShelleneBousher@NapoliBern.com)

Robert A. Grochow, Esq.  
ROBERT A. GROCHOW, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
(212) 608-4400  
[rgrochow@aol.com](mailto:rgrochow@aol.com)

Gregory J. Cannata, Esq.  
LAW OFFICES OF GREGORY J. CANNATA  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
Liaison Counsel for Plaintiffs  
(212) 553-9206  
[cannata@cannatalaw.com](mailto:cannata@cannatalaw.com)

All parties indicated on the  
**SERVICE RIDER**

Sworn to before me this  
11th day of September 2007



Charlene S. Rogers  
Notary Public  
No. 01RO 4703494  
Qualified in Westchester County  
Commission Expires 11/30/09



\_\_\_\_\_  
Cristina A. Villani